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 6 AG-SEEDS UNLIMITED

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 8 UNITED STATES BANKRUPTCY COURT  
 9 EASTERN DISTRICT OF CALIFORNIA  
 10 (SACRAMENTO DIVISION)

11 In re:	)	CASE NO. 15-29136
	)	Chapter 12
12 P&M SAMRA LAND	)	
13 INVESTMENTS, LLC,	)	DCN: MAS-10
	)	
14 Debtor.	)	<b>REPLY TO OPPOSITION TO MOTION</b>
	)	<b>TO DISMISS CASE BASED ON DEFAULT</b>
	)	<b>UNDER CONFIRMED PLAN</b>
	)	
	)	Date: February 5, 2018
	)	Time: 10:00 a.m.
	)	Dept: A

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 19 Creditor Ag-Seeds Unlimited (“Ag-Seeds”) hereby submits this reply to the opposition to  
 20 motion to dismiss submitted by the debtor, P&M Samra Land Investments, LLC (“Debtor”). The  
 21 Debtor’s reply contains essentially no competent admissible evidence and instead is literally a plea  
 22 on bended knee for more time to accomplish what the Debtor already has had three years to  
 23 accomplish in Chapter 12. While claiming that its real property had more than enough equity to  
 24 pay all secured debt in full, the Debtor has apparently done next to nothing to pay down that debt,  
 25 much less make payments on that debt as and when due under its confirmed plan. Moreover, the  
 26 Debtor has provided, at best, a very weak explanation as to why this situation has come to pass.  
 27 Importantly, no explanation whatsoever is given as to why the Debtor did not approach the  
 28 creditors well before now to explain its supposed situation and the Debtor has failed to present any

By: /s/ Mark A. Serlin  
MARK A. SERLIN, Attorneys for Creditor  
AG-SEEDS UNLIMITED

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